

Exhibit C

10. Plaintiff responds to Defendants' First Set of Interrogatories subject to and without waiver of all of the foregoing General Objections. Plaintiff has made reasonable efforts to respond to the First Set of Interrogatories as Plaintiff understands and interprets them. If Defendants subsequently seeks any information not yet identified, Plaintiff reserves the right to supplement these Answers. Further, Plaintiff specifically reserves the right to supplement Plaintiff's Answers based upon information which is discovered in the process of preparing for hearings or trial and information not yet obtained by Plaintiff.

B. Specific Objections and Answers

Without waiver of the foregoing general objections, Plaintiff responds as follows to Defendants' First Set of Interrogatories:

PLAINTIFF'S RESPONSES TO DEFENDANTS'
FIRST SET OF INTERROGATORIES

1. Identify each person, including the individual's telephone number, address, or other contact information, whom you have contacted or who has contacted you since August 30, 2023, about any Omnis Party.

Answer: Plaintiff objects to this Interrogatory to the extent that it is ambiguous, vague, overbroad and/or unduly burdensome. This interrogatory also has no qualifiers for any conversations she may have had with counsel. This interrogatory asks for communications about "any Omnis Party," for communications of *any sort* for a 17-month period of time. *Aikens v. Cianbro Corp.*, Civil Action No. 0:20-cv-2174-SAL-TER, 2022 U.S. Dist. LEXIS 9385, at *18 (D.S.C. Jan. 19, 2022)(Plaintiff seeking discovery on "any and all communications between the Defendant and Plaintiff," was "overly broad and vague and fails to identify what specific communications it expects the witness," should attest to).

2. Identify each employee, agent, or representative of Omnis, either current or former, you believe discriminated against you because of your religion. For each such individual, separately state the name of the individual and the basis for your allegation that he or she discriminated against you.

Answer: Plaintiff objects to this Interrogatory to the extent that it calls for a legal conclusion, is ambiguous, vague, overbroad and/or unduly burdensome. Plaintiff further objections as this interrogatory asks for a legal conclusion and determinations of fact. An ultimate issue in this